

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.)
)
 HANA F. AL JADER)

Criminal No. 05-10085-RCL

**DEFENDANT’S SECOND MOTION IN LIMINE
TO EXCLUDE EVIDENCE**

Defendant Hana F. Al Jader hereby moves in limine for an order precluding the government from eliciting speculative testimony from its witnesses that Ms. Al Jader has a “boyfriend,” Ammar Chamo. Mr. Chamo is a very close friend, frequent companion and business partner of Ms. Al Jader. Throughout its investigation of this case, the government has questioned practically every person it interviewed as to whether there is more to Ms. Al Jader’s relationship with Mr. Chamo, specifically, whether they are romantically involved. They are not.

Ms. Al Jader is married and has had six children with her husband, Mohammad Al Saud, a prince in the Saudi Royal family. Ms. Al Jader lives with her husband, who is disabled as a result of a horrific car accident.

No legitimate purpose would be served by permitting the government to elicit from its witnesses insinuation and speculation, all untrue, about Ms. Al Jader’s relationship with Mr. Chamo. His conduct is not in any way at issue. He will not be a witness at trial. The only purpose to be served by permitting government witnesses to titillate the jury with their opinions about Mr. Chamo’s relationship with Ms. Al Jader would be the forbidden purpose of character assassination.

For all of the foregoing reasons, speculation about a romantic relationship between Ms. Al Jader and Mr. Chamo is untrue, irrelevant and inadmissible under FRE 401 and 402. It is also bad character evidence that is not admissible under FRE 404. Even if it had any probative value, the court should still exclude it under FRE 403 because probativeness would be minimal and substantially outweighed by unfair prejudice.

HANA AL JADER

By her attorneys,

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Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on August 22, 2006.

/s/ E. Peter Parker

E. Peter Parker